

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>WILMINGTON TRUST NATIONAL</b>	)	
<b>ASSOCIATION, AS SUCCESSOR</b>	)	
<b>TRUSTEE TO CITIBANK, N.A., AS</b>	)	Case No: 13-cv-6070
<b>TRUSTEE FOR BNC MORTGAGE</b>	)	
<b>LOAN TRUST SERIES 2007-3,</b>	)	Judge: Andrea R. Wood
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>JOANN S. GOLDSTEIN; JEFFREY S.</b>	)	
<b>GOLDSTEIN,</b>	)	
<b>Defendants.</b>	)	

**PLAINTIFF’S RULE 55 MOTION FOR DEFAULT JUDGMENT AND FOR ENTRY OF  
JUDGMENT OF FORECLOSURE**

NOW COMES the Plaintiff, WILMINGTON TRUST NATIONAL ASSOCIATION, AS SUCCESSOR TRUSTEE TO CITIBANK, N.A., AS TRUSTEE FOR BNC MORTGAGE LOAN TRUST SERIES 2007-3, by Megan Christine Adams, one of its attorneys, and in support of its Motion for Default Judgment pursuant to Federal Rule of Civil Procedure 55, states as follows:

1. Plaintiff initiated these proceedings on August 27, 2013, seeking a Judgment of Foreclosure and Sale.
2. That the Defendants:
  - a. Jeffrey S. Goldstein was served by PERSONAL service on September 12, 2013  
(see Docket Entry #5)
  - b. Joann S. Goldstein was served by SUBSTITUTE service on September 12, 2013  
and a copy of the Summons and Complaint was mailed to Joann S. Goldstein at  
the address where service was effectuated on September 13, 2013.

3. More than twenty (20) days have elapsed since Defendants were served, and he/she has failed to answer, plead, or otherwise defend the allegations of Plaintiff's Complaint.
4. Defendant's failure to defend and deny the allegations of Plaintiff's complaint results in those allegations being admitted and Plaintiff therefore moves the Court for the entry of Default Judgment.
5. Defendant's are not currently on active duty in the United States Military. (*see* Affidavit as to Military Service attached as Exhibit A).
6. Plaintiff's claim of damages is for a sum that is made certain by computation and is more specifically set forth in its supporting Judgment Affidavit. (*see* Affidavit of Amounts Due and Owing attached as Exhibit B; *see* Certificate of Prove-up of Foreclosure Fees and Costs attached as Exhibit C).

WHEREFORE, the Plaintiff, WILMINGTON TRUST NATIONAL ASSOCIATION, AS SUCCESSOR TRUSTEE TO CITIBANK, N.A., AS TRUSTEE FOR BNC MORTGAGE LOAN TRUST SERIES 2007-3, moves this Honorable Court for an Order of Default Judgment of Foreclosure against the Defendants, JOANN S. GOLDSTEIN; JEFFREY S. GOLDSTEIN, and for that amount as set forth and made certain in its Judgment Affidavit and Certificate of Prove-up of Foreclosure Fees and Costs.

Respectfully submitted,

By: /s/ Megan Christine Adams

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